## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

Motion	<b>GRAN</b>	NTED.
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	ASHVILLE	RICT OF TENNESSEE DIVISION	Mr. A.A.
UNITED STATES OF AMERICA	)		Otto a may
v.	) ) )	No. 3:13-00113 JUDGE TRAUGER	ř
KAREN LIANE MILLER	)		

## MOTION TO CONTINUE TRIAL AND RELATED DEADLINES

Karen Liane Miller, through counsel, respectfully moves this Honorable Court to continue her trial presently scheduled for Tuesday, August 27, 2013 and related deadlines for the following reasons:

- 1. Ms. Miller is charged in nine (9) counts of making false claims to the Internal Revenue Service (IRS). On July 8, 2013, the Government provided initial discovery which included over 10,000 pages, including a mirror image of a computer hard-drive, with an indeterminate amount of documents, and another disc and bankers boxes which also contain an indeterminate number of documents. Additionally, the Government has advised that there exists two more boxes containing IRS records and correspondence filed with or sent to the IRS. Needless to say, counsel will be unable to review these documents, conduct the necessary investigation, and discuss this case with Mr. Miller in order to be adequately prepared for trial.
- 2. Counsel requires additional time in which to review the voluminous documents and to conduct further investigation into the facts of the case. Further, counsel would require more time to determine whether pretrial motions should be filed and prepare the necessary motions on Ms. Miller's behalf.